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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TERESA I. ROGGIO, an Individual,

Plaintiff,

vs.

COSTCO WHOLESALE CORPORATION, a
Foreign corporation, d/b/a COSTCO #737;
DOES I through X, inclusive; and ROE
BUSINESS ENTITIES XI through XX,
inclusive,

Defendants.

CASE NO. 2:19-cv-01461-KJD-EJY

**STIPULATION AND ~~PROPOSED~~
ORDER TO STAY THE CASE**

Pursuant to Local Rules 6-1 and 26-4, the parties, by and through their respective attorneys of record, stipulate and agree to stay the pendency of this case by forty-five (45) days, to continue the deadline for the parties to file their Joint Pre-Trial order an additional sixty (60) days, and to extend discovery deadlines an additional thirty (30) days.

This is the first request for an extension for the parties to complete the Joint Pre-Trial Order. The Joint Pre-Trial Order is currently due on March 12, 2021. This Stipulation is sought by the parties in order to allow for substantive settlement negotiations to continue with the hopes

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of resolving this matter. The settlement negotiations are ongoing, and the stay will permit the parties to continue and exhaust discussions culminating in a settlement agreement or trial. Currently, the parties have noticed several depositions but the Parties wish to avoid incurring additional costs and fees in order to accommodate settlement discussions.

For this reason, and in order to avoid potentially unnecessary additional fees and costs if this matter settles, the parties hereby stipulate stay this case forty-five (45) days, or February 19, 2021 and continue the deadline for the parties to submit their Joint Pre-Trial order an additional sixty (60) days from the date the stay expires, or until April 20, 2021.

Accordingly, the parties have agreed and stipulated to the following deadlines:


Case Stayed Until:	February 19, 2021
Final Joint Pre-Trial Order to be filed by:	April 20, 2021
Close of Discovery:	April 14, 2021
Initial Expert Disclosures Deadlines:	February 19, 2021
Rebuttal Expert Disclosure Deadline:	March 19, 2021
Final Date for Dispositive Motions:	May 13, 2021

DATED this 5th day of January, 2021

DATED this 5th day of January, 2021

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OLSON, CANNON, GORMLEY, ANGULO
& STOBERSKI

By 
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ORDER

IT IS HEREBY ORDERED:

In accordance with the stipulation of the parties, the Court orders as follows:

Case Stayed Until: February 19, 2021

Final Joint Pre-Trial Order to be filed by: April 20, 2021

Close of Discovery: April 14, 2021

Initial Expert Disclosures Deadlines: February 19, 2021

Rebuttal Expert Disclosure Deadline: March 19, 2021

Final Date for Dispositive Motions: May 13, 2021

IT IS SO ORDERED this 6th day of January, 2021.


UNITED STATES MAGISTRATE JUDGE

Submitted by:

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